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July 8, 2016

VIA ECF

Honorable Kiyo A. Matsumoto
United States District Court
Eastern District of New York
Room S905
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Chung v. Grace Road Church, et. al.,
14 CV 7187 (KAM)

Dear Judge Matsumoto:

Ross & Asmar LLC represents all defendants in the above case. Since the last telephonic conference between counsel and the Court, my office has made several attempts to contact our clients regarding this matter. We have reached out to all e-mail addresses and telephone numbers we have been provided by our clients and through which we have been able to contact them in the past. Defendants have not responded to or answered any of our e-mails or telephone calls.

Due to Defendants' failure to communicate with me or my office, and failure to respond to any of our attempts to reach them, Ross & Asmar LLC ("RA") is unable to prepare a defense to this action or continue to represent the Defendants. We are not able to prepare a motion to dismiss or an Answer to the Complaint without the participation and cooperation of the Defendants.

The only contact information provided to us by our clients were the e-mail addresses and phone numbers we have used to attempt to contact them. We have just realized that an address where Defendants were served is set forth in the Hague service documents filed by Plaintiff. We will send a letter to Defendants at that address today.

For the reasons set forth above, I request that the Court allow three weeks for counsel to receive a response from Defendants to the letter I will mail to them today. In the event Defendants continue not to respond to my communications, I request permission to file a motion seeking RA, specifically including myself and our associate Eric Dawson, be permitted to withdraw as counsel for the Defendants in this matter.

Respectfully,


STEVEN B. ROSS